

IN THE UNITED STATES COURT OF APPEALS
FOR THE FOURTH CIRCUIT

UNITED STATES OF AMERICA

Appellee

v.

Record No. 16-4732

MICHAEL LAWRENCE MAYNES, JR.

Appellant

APPELLANT'S MOTION FOR LEAVE TO SUBMIT
JOINT APPENDIX IN EXCESS OF 500 PAGES

COMES NOW appellant Michael Lawrence Maynes, Jr., by counsel, and moves this Court pursuant to Local Rule 32(a) of the Rules of the Fourth Circuit for leave to submit a joint appendix containing more than 500 pages, and in support thereof states as follows:

1. this Court appointed undersigned counsel, pursuant to the Criminal Justice Act, to represent appellant Michael Lawrence Maynes, Jr. in the above-styled appeal;
2. the Briefing order entered herein requires filing of the joint appendix and appellant's opening brief on or before January 25, 2017;
3. trial in the United States District Court for the Eastern District of Virginia lasted over four (4) days, from May 16 through May 19, 2016, and testimony was taken on post trial motions on November 4, 2016. Moreover the Government wishes to include a transcript from a pretrial motion hearing;
4. one issue appellant intends to present concerns the sufficiency of the evidence to support his convictions for one

count of conspiracy to commit sex trafficking and four separate counts of sex trafficking;

5. counsel for the Government designated all of the trial testimony for inclusion in the joint appendix. Standing alone this testimony was transcribed on more than six hundred (600) pages;

6. appellant Maynes designated additional testimony he gave in post trial motions for inclusion in the joint appendix;

7. appellant Maynes and the Government have designated various documents relating to the sufficiency of the evidence and other issues appellant intends to present to the Court, including the lawfulness of the Court's jury instruction and its ruling on the United States' motion *in limine* regarding certain trial testimony;

8. counsel for the United States does not object to appellant's motion for leave to submit a joint appendix in excess of 500 pages;

9. the interests of justice will be served by the Court's entry of an Order granting appellant Michael Lawrence Maynes, Jr. leave to file a joint appendix in excess of 500 pages.

Wherefore your appellant Michael Lawrence Maynes, Jr., by counsel, respectfully moves this Court for an Order granting him leave to submit a joint appendix containing more than 500 pages.

Michael Lawrence Maynes, Jr.
defendant, by counsel

/s/

Mark Bodner, Esquire
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Certificate of Service

I certify that on January 18, 2017 I will electronically file the foregoing counsel's motion to for leave to submit a joint appendix in excess of 500 pages using the CM/ECF system, which will send notice of such filing to the following registered CM/ECF users:

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/s/

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